

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

FCC EQUIPMENT FINANCING, INC.,)	
)	
Plaintiff,)	
)	Case No. 1:10-cv-00278 (JCC/JFA)
v.)	
)	
RICHARD W. GROUX, JR.,)	
EDWARD G. LUNCEFORD, and)	
RICHARD M. HAZEL,)	
)	
Defendants.)	

STIPULATION OF DISMISSAL PURSUANT TO RULE 41(a)(1)(A)(ii)

Plaintiff FCC EQUIPMENT FINANCING, INC. (“FCC”), Defendant RICHARD W. GROUX, JR. (“Groux”), Defendant EDWARD G. LUNCEFORD (“Lunceford”), and Defendant RICHARD M. HAZEL (“Hazel”), by their undersigned counsel, hereby file the following Stipulation of Dismissal Pursuant to Rule 41(a)(1)(A)(ii), stating as follows:

1. FCC filed its Complaint on March 22, 2010 against Groux and Lunceford.
2. FCC filed its Amended Complaint on May 17, 2010 against Groux, Lunceford and Hazel.
3. Groux filed his Answer to the FCC’s Amended Complaint on June 7, 2010.
4. Lunceford filed his Answer to FCC’s Amended Complaint on June 7, 2010.
5. Hazel filed his Answer to FCC’s Amended Complaint on June 25, 2010.
6. FCC seeks to voluntarily dismiss with prejudice all of its claims asserted in FCC’s Amended Complaint against Defendants Groux, Lunceford and Hazel; and said Defendants stipulate to this dismissal.

WHEREFORE, Plaintiff FCC, Defendant Groux, Defendant Lunceford and Defendant Hazel, by their undersigned counsel, hereby stipulate to dismiss all claims asserted in this action with prejudice pursuant to Federal Rule of Civil Procedure 41.

FCC EQUIPMENT FINANCING, INC.,
RICHARD W. GROUX, JR.,
EDWARD G. LUNCEFORD, and
RICHARD M. HAZEL
Jointly
By Counsel

Dated: October 14, 2010

/s/ Rajesh C. Noronha

Susan M. Dadio (VSB #40946)
Rajesh C. Noronha (VSB #75259)
Buchanan Ingersoll & Rooney, P.C.
1737 King Street, Suite 500
Alexandria, VA 22314-2727
Telephone: 703-836-6620
Facsimile: 703-836-2021
Email: rajesh.noronha@bipc.com

*Counsel to Plaintiff FCC Equipment
Financing, Inc.*

/s/ Alan B. Croft

Lawrence J. McClafferty (VSB # 37688)
Alan B. Croft (VSB # 9209)
McCandlish & Lillard, P.C.
212 E. Market Street
Leesburg, VA 20176
Telephone: 703-737-0200
Facsimile: 703-737-0165
Email: lmccclafferty@mccandlaw.com

Counsel to Defendant Edward G. Lunceford

/s/ Frederick H. Kruck, Jr.

Frederick H. Kruck, Jr. (VSB #22586)
Law Office of Frederick H. Kruck, Jr., PC
7551 Foxview Drive
Warrenton, VA 20186
Telephone: 540-347-2900
Facsimile: 815-361-7432
Email: fred@fhklaw.net

Counsel to Defendant Richard W. Groux, Jr.

/s/ Timothy G. Moore

Timothy G. Moore (VSB #41730)
Email: tmoore@spottsfain.com
Edward Everett Bagnell, Jr. (VSB #74647)
Email: ebagnell@spottsfain.com
Spotts Fain, P.C.
411 East Franklin Street, Suite 600
Richmond, VA 23219
Telephone: 804-697-2000
Facsimile: 804-697-2100

Counsel to Defendant Richard M. Hazel

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October, 2010, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Lawrence J. McClafferty, Esq.
Alan B. Croft, Esq.
McCandlish & Lillard, P.C.
212 E. Market Street
Leesburg, VA 20176
Telephone: 703-737-0200
Facsimile: 703-737-0165
Email: lmccclafferty@mccandlaw.com
Email: acroft@mccandlaw.com
Counsel to Defendant Edward G. Lunceford

Frederick H. Kruck, Jr., Esq.
Law Office of Frederick H. Kruck, Jr., PC
7551 Foxview Drive
Warrenton, VA 20186
Telephone: 540-347-2900
Facsimile: 815-361-7432
Email: fred@fhklaw.net
Counsel to Defendant Richard W. Groux, Jr.

Timothy G. Moore, Esq.
Email: tmoore@spottsfain.com
Edward Everett Bagnell, Jr.
Email: ebagnell@spottsfain.com
Spotts Fain, P.C.
411 East Franklin Street, Suite 600
Richmond, VA 23219
Telephone: 804-697-2000
Facsimile: 804-697-2100
Counsel to Defendant Richard M. Hazel

/s/ Rajesh C. Noronha

Susan M. Dadio (VSB #40946)
Rajesh C. Noronha (VSB #75259)
Buchanan Ingersoll & Rooney, P.C.
1737 King Street, Suite 500
Alexandria, VA 22314-2727
Telephone: 703-836-6620
Facsimile: 703-836-2021
Email: rajesh.noronha@bipc.com

Counsel to Plaintiff FCC Equipment Financing, Inc.